

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ERIE DIVISION

ABBY B. CONLEY,	:	JURY TRIAL DEMANDED
Plaintiff	:	
	:	
VS.	:	
	:	
COUNTY OF ERIE, ERIE COUNTY	:	
OFFICE OF CHILDREN AND YOUTH,	:	
a/k/a ERIE COUNTY CHILD WELFARE	:	
SERVICE, RICHARD SCHENKER,	:	
individually and in his capacity as County	:	
Executive of Erie County, Pennsylvania, :		
PETER CALLAN, individually and in his	:	
capacity as Erie County Director of Personnel,	:	
DEBRA LIEBEL, individually and in her	:	
capacity as Executive Director, Erie County	:	
Office of Children and Youth, a/k/a Erie	:	
County Child Welfare Service and JOHN A.	:	CIVIL ACTION NO. 05-76E
ONORATO, ESQUIRE, individually and in	:	
his capacity as Erie County Solicitor	:	
Defendants	:	

MOTION FOR ENLARGEMENT OF TIME WITHIN
WHICH TO FILE PLAINTIFF'S PRE-TRIAL NARRATIVE

NOW comes the Plaintiff, Abby B. Conley, by her counsel, Timothy D. McNair, Esquire and Anthony Angelone, Esquire and respectfully moves this Honorable Court for enlargement of time to file her pre-trial narrative statement, respectfully representing:

1. Due to the unavailability of witnesses and the length of several depositions, counsel have been engaged in depositions of various witnesses for the past three weeks.

2. Some of the deposition transcripts are not yet available.
3. During the week of April 3, 2006, counsel spent all day Monday, Wednesday afternoon, Thursday morning and afternoon and Friday morning and afternoon in deposition.
4. Due to this activity, counsel has not had the opportunity to prepare a complete and accurate Pre-Trial Narrative Statement.
5. Defendant, John A. Onorato has filed a Motion for Summary Judgment, to which Plaintiff will respond.
6. Defendant County of Erie and the individual defendants in their official capacity have filed a motion to extend the deadline for filing dispositive motions, which Plaintiff does not oppose.
7. Plaintiff respectfully moves this Honorable Court for an enlargement of time to file her Pre-Trial Narrative until Wednesday, April 12, 2006, the same extent as requested by defendant County of Erie..

Respectfully submitted,

LAW OFFICES OF TIMOTHY D. McNAIR

By: _____
Timothy D. McNair, Esquire
Attorney for Plaintiff
821 State Street
Erie, PA 16501
(814) 452-0700 , fax (814) 454-2371
PA 34304
tmcnair@velocity.net

VENDETTI & VENDETTI

By s/ Anthony Angelone
Anthony Angelone, Esquire
Attorney for Plaintiff
3820 Liberty Street
Erie, Pennsylvania 16509
(814) 868-8541
PA 56206
aangelone@vendettilaw.com
(814) 452-0700